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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SOHEIL ZAERPOUR & THE PEOPLE OF THE UNITED STATES OF
AMERICA

Write the full name of each plaintiff.

____ CV ____
(Include case number if one has been
assigned)

-against-

UBS GROUP AG, et al.

(See attached rider).

COMPLAINT

Do you want a jury trial?

☒ Yes ☐ No

Write the full name of each defendant. If you need more
space, please write "see attached" in the space above and
attach an additional sheet of paper with the full list of
names. The names listed above must be identical to those
contained in Section II.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ Federal Question

☐ Diversity of Citizenship

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

U.S. Securities laws, RICO, civil rights laws, criminal laws (incl. computer crimes), foreign corrupt practices law.

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, _____, is a citizen of the State of _____
(Plaintiff's name)

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of _____

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, _____, is a citizen of the State of _____
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of _____

If the defendant is a corporation:

The defendant, _____, is incorporated under the laws of the State of _____

and has its principal place of business in the State of _____

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____.

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

Soheil		Zaerpour	
First Name	Middle Initial	Last Name	
16-C Thornton Pl.			
Street Address			
Passaic, Clifton		New Jersey	07012
County, City		State	Zip Code
(862) 668-4036		soheil.zaerpour@njwg.cap.gov	
Telephone Number		Email Address (if available)	

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1: See attached rider.

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 2:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 3:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

III. STATEMENT OF CLAIM

Place(s) of occurrence: New York City (& globally)

Date(s) of occurrence: 2002 until present (see 21-CV-09680 for details)

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

Defendant co-conspirator banks coordinated to manipulate foreign exchange prices and benchmark rates against the people of the United States and abroad and plaintiff. See NYSD 21-CV-09680 for the details.

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

Loss of principal amount and opportunity costs. See Complaint 21-CV-09680 for the details (ECF no. 50-1).

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

Monetary damages and punitive damages. See Compl. 21-CV-09680 for calculation details.

Any other relief deemed just and proper by this Court.

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

August 16, 2022

Dated

Soheil

Plaintiff's Signature

Zaerpour

First Name

Middle Initial

Last Name

16-C Thornton Pl.

Street Address

Passaic, Clifton

New Jersey

07012

County, City

State

Zip Code

(862) 668-4036

soheil.zaerpour@njwg.cap.gov

Telephone Number

Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

RIDER TO CIVIL COVER SHEET

PLAINTIFF(S):

SOHEIL ZAERPOUR & THE PEOPLE OF THE UNITED STATES

Plaintiff's address: 16-C Thornton Pl. Clifton, New Jersey 07012, USA.

DEFENDANTS:

BANK OF AMERICA CORPORATION; BANK OF AMERICA, N.A.; BARCLAYS BANK PLC; BARCLAYS PLC; BARCLAYS CAPITAL, INC.; BNP PARIBAS GROUP; BNP PARIBAS USA, INC.; BNP PARIBAS S.A.; BNP PARIBAS SECURITIES CORP.; CITIGROUP, INC.; CITIBANK, N.A.; CITIGROUP GLOBAL MARKETS, INC.; CREDIT SUISSE GROUP AG; CREDIT SUISSE AG; CREDIT SUISSE INTERNATIONAL; CREDIT SUISSE SECURITIES (USA) LLC; DEUTSCHE BANK AG; DEUTSCHE BANK SECURITIES INC.; THE GOLDMAN SACHS GROUP, INC.; GOLDMAN, SACHS & CO. LLC; HSBC HOLDINGS PLC; HSBC BANK PLC; HSBC NORTH AMERICA HOLDINGS INC.; HSBC BANK USA, N.A.; HSBC SECURITIES (USA) INC.; J.P. MORGAN CHASE & CO.; J.P. MORGAN CHASE BANK, N.A.; J.P. MORGAN SECURITIES LLC; MERRILL LYNCH, PIERCE, FENNER & SMITH INC.; MUFG BANK, LTD.; MUFG SECURITIES AMERICAS INC.; MORGAN STANLEY; MORGAN STANLEY & CO., LLC; MORGAN STANLEY & CO. INTERNATIONAL PLC; NATWEST MARKETS SECURITIES INC.; RBC CAPITAL MARKETS LLC; THE ROYAL BANK OF CANADA; ROYAL BANK OF SCOTLAND PLC; SG AMERICAS SECURITIES LLC; SOCIETE GENERALE S.A.; STANDARD CHARTERED BANK; STANDARD CHARTERED SECURITIES (NORTH AMERICA), INC.; UBS AG; UBS GROUP AG; and UBS SECURITIES LLC

DEFENDANT(S) ADDRESS(ES) AND COUNTY(IES):

Bank of America Corporation has corporate offices located at 100 N. Tryon St., Charlotte, NC, 28255.

Bank of America, N.A. has corporate offices located at 100 N. Tryon St., Charlotte, NC, 28255.

Barclays Bank PLC has offices located at 745 7th Avenue, New York, NY 10019.

Barclays PLC has corporate offices located at 1 Churchill Place, London E14 5HP, United Kingdom.

Barclays Capital, Inc. has offices located at 745 7th Avenue, New York, NY 10019.

BNP Paribas Group's headquarters is located at 16, boulevard des Italiens, 75009 Paris, France

BNP Paribas USA, Inc. has offices located at 787 Seventh Avenue , New York, NY 10019.

BNP Paribas S.A. has offices located at 787 Seventh Avenue , New York, NY 10019.

BNP Paribas Securities Corp. has offices located at 787 Seventh Avenue , New York, NY 10019.

Citigroup, Inc. has corporate offices located at 388 Greenwich Street New York, NY 10013.

Citibank, N.A. has offices located at 388 Greenwich Street New York, NY 10013.

Citigroup Global Markets, Inc. has offices located at 388 Greenwich Street, New York, NY 10013.

Credit Suisse Group AG has corporate offices located at 11 Madison Avenue, New York, NY 10010.

Credit Suisse AG has offices located at 11 Madison Avenue, New York, NY 10010.

Credit Suisse International has corporate offices located at One Cabot Square, London, E14 4QJ, United Kingdom.

Credit Suisse Securities (USA) LLC has offices located at 11 Madison Avenue, New York, NY 10010.

Deutsche Bank AG has offices located at 60 Wall Street, New York, NY 10005.

Deutsche Bank Securities Inc. has offices located at 60 Wall Street, New York, NY 10005.

The Goldman Sachs Group, Inc. has offices located at 200 West Street, New York, NY 10282.

Goldman, Sachs & Co. LLC has offices located at 200 West Street, New York, NY 10282.

HSBC Holdings PLC has corporate offices located at 8 Canada Square, London, E14 5HQ, United Kingdom.

HSBC Bank PLC has corporate offices located at 8 Canada Square, London, E14 5HQ, United Kingdom.

HSBC North America Holdings Inc. has an office located at 452 Fifth Ave., New York, NY 10018.

HSBC Bank USA, N.A. has an office located at 452 Fifth Ave., New York, NY 10018.

HSBC Securities (USA) Inc. has an office located at 452 Fifth Ave., New York, NY 10018.

J.P. Morgan Chase & Co. has corporate offices located at 270 Park Avenue, New York, NY 10017.

J.P. Morgan Chase Bank, N.A. has corporate offices located at 1111 Polaris Parkway, Columbus, OH 43240.

J.P. Morgan Securities LLC has offices located at 277 Park Avenue, New York, NY 10172 .

Merrill Lynch, Pierce, Fenner & Smith Inc. has corporate offices located at One Bryant Park, New York, NY 10036.

MUFG Bank, Ltd. has an office located at 1251 Avenue of the Americas, New York, NY 10020-1104.

MUFG Securities Americas Inc. has offices located at 1221 Avenue of the Americas, New York, NY 10020-1001.

Morgan Stanley has corporate offices located at 1585 Broadway Avenue, New York, NY 10036.

Morgan Stanley & Co., LLC has corporate offices located at 1585 Broadway Avenue, New York, NY 10036.

Morgan Stanley & Co. International PLC has offices located at Cabot Square, Canary Wharf, London, E14 4QA, United Kingdom.

NatWest Markets Securities Inc. has corporate offices located at 600 Washington Boulevard Stamford, CT 06901.

RBC Capital Markets LLC has offices located at 200 Vesey Street, 9th Floor, New York, NY 10281.

The Royal Bank of Canada has corporate offices located at 200 Bay Street, Royal Bank Plaza, Toronto, ON M5J 2J5, Canada.

Royal Bank of Scotland PLC has corporate offices located at 36 St Andrew Square, Edinburgh, United Kingdom, EH2 2YB.

SG Americas Securities LLC has corporate offices located at 245 Park Avenue, New York, NY 10167.

Societe Generale S.A. has corporate offices located at 29 Boulevard Haussmann 75009 Paris, France.

Standard Chartered Bank has corporate offices located at 1 Basinghall Avenue, London, EC2V 5DD, United Kingdom.

Standard Chartered Securities (North America), Inc. has corporate offices located at 1095 Avenue of the Americas, New York, NY 10036.

UBS AG has offices located at 1285 Avenue of the Americas, New York, NY 10019.

UBS Group AG has corporate offices located at Bahnhofstrasse 45, Zurich, 8001 Switzerland.

UBS Securities LLC has offices located at 1285 Avenue of the Americas, New York, NY 10019.

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The Protocols Of Zion

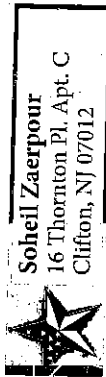
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A one page summary

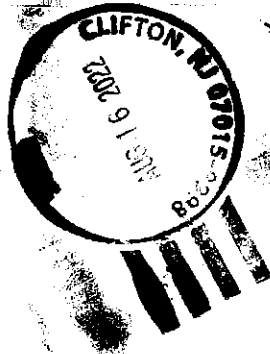
Goyim are mentally inferior to Jews and can't run their nations properly. For their sake and ours, we need to abolish their governments and replace them with a single government. This will take a long time and involve much bloodshed, but it's for a good cause. Here's what we'll need to do:

- * Place our agents and helpers everywhere
- * Take control of the media and use it in propaganda for our plans
- * Start fights between different races, classes and religions
- * Use bribery, threats and blackmail to get our way
- * Use Freemasonic Lodges to attract potential public officials
- * Appeal to successful people's egos
- * Appoint puppet leaders who can be controlled by blackmail
- * Replace royal rule with socialist rule, then communism, then despotism
- * Abolish all rights and freedoms, except the right of force by us
- * Sacrifice people (including Jews sometimes) when necessary
- * Eliminate religion; replace it with science and materialism
- * Control the education system to spread deception and destroy intellect
- * Rewrite history to our benefit
- * Create entertaining distractions
- * Corrupt minds with filth and perversion
- * Encourage people to spy on one another
- * Keep the masses in poverty and perpetual labor
- * Take possession of all wealth, property and (especially) gold
- * Use gold to manipulate the markets, cause depressions etc.
- * Introduce a progressive tax on wealth
- * Replace sound investment with speculation
- * Make long-term interest-bearing loans to governments
- * Give bad advice to governments and everyone else

Eventually the Goyim will be so angry with their governments (because we'll blame them for the resulting mess) that they'll gladly have us take over. We will then appoint a descendant of David to be king of the world,



Sohell Zaerpour
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Clifton, NJ 07012



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